



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, D.C. 20410-8000

OFFICE OF HOUSING

January 21, 2009

Fernando Garcia, Esquire  
Adorno & Yoss, LLP  
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Miami FL 3314-6012

Subject: ILS-32392; Palmetto Towers Group, LLC; Dadeland Place, a  
Condominium; I-09-034

ILS 32409; Lakeside Development Group LLC; Lakeside at Tamarac, a  
Condominium

ILS-32410; San Marco at Fontainebleau, LLC; San Marco, a Condominium

ILS 32411; Palm Hill Investments, LLC; Palm Hill, a Condominium

ILS 32412; In Developments, LLC; The Courts at Oakland Park, a Condominium

ILS 32413; Water Place Group, LLC ; Lakeside Villas at Kendall, a Condominium

Dear Fernando Garcia, Esquire:

The purpose of this letter is to inform you that HUD has closed its investigation into Palmetto Towers Group, LLC; Lakeside Development Group LLC; San Marco at Fontainebleau, LLC; Palm Hill Investments, LLC; In Developments LLC; and Water Place Group, LLC and the potential violations of the Interstate Land Sales Full Disclosure Act (Act), 15 U.S.C. §1701 *et seq* that these entities may have done by not registering with the Department pursuant to the Act.

In response to the Department's November 21, 2008 jurisdictional request letter and the Department's December 22, 2008 request for additional information regarding Palmetto Towers Group, LLC and Dadeland Place a condominium as well as regarding the other subject properties and the entities referenced above, you provided responses which were dated December 8, 2008, December 17, 2008 and January 15, 2009. You also provided additional information as requested in the forms of copies of contracts and statements of explanation.

According to your responses, it has been determined that Dadeland Place, a Condominium Lakeside at Tamarac, a Condominium; San Marco, a Condominium; Palm Hill, a Condominium; The Courts at Oakland Park, a Condominium; and Lakeside Villas at Kendall, a Condominium were not required to register with the Department according to the Improved Lot provisions of 15 U.S.C. §1702(a)(2). Upon review of the documentation provided by the Developers, the above referenced developments were constructed on improved land upon which were existing residential buildings. Based upon the representations made, at the conversion, these buildings did not require extensive re-gutting or modification and that the buildings were physically habitable and usable for the purpose for which purchased and were ready for occupancy and had all necessary and customary utilities extended to the units contained therein and were considered complete.

According to the representations made by the Developers and relied upon by the Department, for each of the named developments, no renovations were made to the individual units and the units were sold "*as is*". It was represented to the Department that exterior and interior hallways were painted, landscaping enhanced, and new furniture was provided for pool areas. For the development The Courts at Oakland Park, a Condominium, a new playground was also added. For the Dadeland development, minor elevator repairs were made during the course of remodeling but the elevators were always operable so as to provided access to units.

Thank you for your cooperation. If there are any questions, please contact William J. Thomas, Consumer Protection Compliance Specialist, at (202) 402-3006.

Sincerely,



William Thomas  
Office of RESPA and  
Interstate Land Sales